

Planning Committee

02 February 2024

Agenda item number 13

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

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Date of report: 15 January 2024

Appendix 1 – Future Homes and Building Standards 2023 consultation

Appendix 2 - Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Plan

Appendix 1 – Department for Levelling Up, Housing and Communities

Document: The Future Homes and Buildings Standards: 2023 consultation [The Future Homes and Buildings Standards: 2023 consultation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation)

Due date: 06 March 2024

Status: Technical consultation

Proposed level: Planning Committee endorsed

Notes

The UK government has set a legally binding target of reaching net zero greenhouse gas emissions by 2050. From homes to offices, the UK's built environment is responsible for around 30% of the UK's greenhouse gas emissions; decarbonising new buildings is an important part of that challenge. As set out in the [Heat and Buildings Strategy](#), this also presents substantial opportunities for the UK: to grow skills, build diverse job markets, level up across the country, reduce bills by improving efficiency, tackle fuel poverty, have warmer and better buildings, and ensure our energy system is secure and fit for the future.

The minimum energy efficiency requirements for new homes and non-domestic buildings are set through Part L (Conservation of fuel and power) of Schedule 1 and Part 6 of the Building Regulations. In 2021 the government implemented an uplift to Part L and introduced regulations to reduce overheating risk in new residential buildings (Part O), which came into effect on 15 June 2022. As a result of the uplift, new homes and non-domestic buildings are now expected to produce significantly lower carbon emissions compared to those built to the 2013 standards. The uplift represents an important step towards a cleaner, greener and safer built environment.

While progress has been made, the [Heat and Buildings Strategy](#) outlines the need to eliminate virtually all emissions arising from heating, cooling and energy use in our buildings. The 2025 Future Homes and Buildings Standards aim to build on the 2021 Part L uplift and set even more ambitious requirements for energy efficiency and heating for new homes and non-domestic buildings. These standards will be in line with meeting our 2050 net zero target and will mean no further work will be needed for new buildings to produce zero carbon emissions as the electricity grid decarbonises. They can also reduce running costs, and, coupled with improvements already made to ventilation and energy efficiency standards, can prevent damp and mould, excess cold and heat, and improve air quality. Delivering warm, safe and decent homes is a priority for government in setting these new standards.

Proposed response

- a) We agree with a definition of “Zero-Carbon Ready¹” that ensures that they will be zero-carbon once the grid decarbonises. This is an effective ban on new fossil heating systems and should be supported.
- b) We disagree with separating out embedded emissions from usage emissions. There is significant government investment through various initiatives, including the Paludiculture Exploration Fund, in developing new domestic crops that can be grown on wetlands unsuitable for other cultivation and farming. The primary identified market is in building materials and other uses for biobased fibres, for which there is potentially a strong domestic supply. These materials can offer significant advantages through the lifecycle of a building:
- Embodied carbon is generally very low, and the resources are entirely renewable.
 - In some cases the materials have the potential to be negative emission – for example there are some biobased materials that include biochar as a material.
 - Whilst in use they provide carbon storage within their materials in the same manner as timber. However, unlike timber the crops can be harvested annually or bi-annually, and without reducing the overall climate benefits of the land management approach.
 - At end of life, they are easily disposed of without further risk to the environment.
 - These materials are still at the development and testing stage, and as such are not available for general use in the UK, as they will need to pass through the certification process to guarantee certain aspects (such as fire resistance).

However, as innovative materials, whilst having the potential to reduce the overall footprint of a building over its lifetime, it is not yet clear whether they would be able to compete with the most advanced synthetic materials.

Essentially, if a material can have a significant overall lifetime reduction to the energy and environmental footprint of the building, even if that leaves the overall usage of the building below the optimum, it would be helpful to have a way for that to be taken into account.

- c) 4.2 says ‘Option 1 has an estimated additional capital cost of £190 per dwelling. As with the proposed notional buildings for homes not connected to heat networks outlined above, the inclusion of low-carbon heat will deliver significant carbon savings, while the addition of solar panels will push up capital costs while giving bill savings for occupants; Option 2 will be proportionately cheaper to build, at the cost of higher bills for households’.

How much is ‘proportionately cheaper’ and ‘higher bills’ compared to option 1? Option 1 is £190 which does not seem a lot in the grand scheme of things... so how much more will option 2 cost?

¹ meaning no further work will be needed for them to have zero carbon emissions once the electricity grid has fully decarbonised

- d) Sections 4.2.2² and 4.2.3³ seem to involve a methodological assumption that appears wrong. Essentially, the position is that as the grid decarbonises, use of electricity becomes greener, so efforts to reduce your own energy use and install your own solar become less valuable as an emissions avoidance technique. This ignores the fact that for the grid to decarbonise, someone still has to make those savings and install solar. So, the approach should be to compare these energy savings to energy savings that are proposed elsewhere, rather than just dismiss the advantage of energy savings.
- e) Section 4.2.4 – Notional Building options – build costs do influence prices, but this may not always be the main driver. A main driver of house cost is land value, if houses cost more to build, land price will fall. We would also note that given the steepness in the Energy GHG emissions required to keep the Broads in line with the UK carbon budget (13% per year), any lessening of new build standards, however small they are in the overall picture, pushes us off target.
- f) Question 53 & 54 – If we are going to promote the use of our rivers in urban areas for water source heat networks, allowing sleeving seems a sensible way forward.
- g) Question 69 – about using local weather – will this be monitored to reflect a changing climate?

² 4.2.2 says, inter alia: However, while the efficiency of solar PV panels has improved substantially over the last decade, the pace of electricity grid decarbonisation means that solar PV panels make a relatively small contribution to the carbon savings of individual homes compared with the switch to low-carbon heating

³ 4.2.3 says, inter alia: Grid decarbonisation also means that fabric improvements are increasingly not a cost-effective intervention to reduce carbon

Appendix 2 – Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Plan

Document: [Neighbourhood Plan – Belton with Browston Parish Council \(norfolkparishes.gov.uk\)](https://www.norfolkparishes.gov.uk)

Due date: 28 January 2024

We have an extension to after this Committee.

Status: Regulation 14

Proposed level: Planning Committee Endorsed

Notes

The Neighbourhood Plan says: This NP contains non-strategic policies to support and add further detail to policies already adopted, specifically for Belton with Browston, Burgh Castle, and Fritton with St Olaves as the designated neighbourhood area. This includes further detail on design, housing, the natural and historic environment, and community services. Where there are policy details missing that are important to the parishes, or where it was felt that a slightly different policy is needed, then new non-strategic Policies have been developed for this NP. Some of the Policies are not strictly ‘planning’ related, but it was felt that they were important enough to include in the Plan and identify as ‘Community Actions’. These are actions that the Parish Councils and local community will lead on, rather than come through the planning system.

Proposed response

Summary of response

The Plan is welcomed. The comments seek clarity at this stage of plan making.

Detailed comments

In terms of developments at Holiday parks, you may wish to encourage and enable the use of seasonal buses – apparently the scheme at Vauxhall Holiday park has been very successful. [A new bus route is coming to Great Yarmouth this summer | Great Yarmouth Mercury](#)

Suggest you put a year on the front of the Plan.

Images need alt text.

Para 22 – local plans plural

Policy 1 – only talks about residential development. What about other types of development?

Para 67 – the sentence about questionnaires and public engagement seems to not belong there – not sure of the relevance.

Para 67 – who is ‘we’?

Para 68 – should the access be safe and convenient?

Policy 4 – are a:f ‘and’ – as in all need to be met? I am guessing it should be and.

Policy 4: g) seems like a separate criterion that does not form part of the list. Firstly, reading point g after the intro text to the list does not work in sentence form. But also, part g is not just about affordable housing.

Policy 4 – if this is meant to include community led development, it is contrary to the NPPF – the NPPF at para 73b says such sites need to be adjacent to existing settlements whereas policy 4 talks about outside of development boundaries.

Policy 4, g bullet 1: using the word ‘it’ is not clear. I think this is what you mean: ‘Is demonstrated through financial appraisal that ~~it~~ some market housing is essential to deliver affordable housing or other community benefits on-site’.

Policy 4 – I am not convinced that market dwellings outside of development boundaries to act as enabling development for community benefits. Firstly, this could be located far from the settlement and therefore far from the community to which it benefits and therefore how can this thing benefit the community if it is not linked somehow. Secondly, the reasons for market housing outside of settlement/development boundaries are listed in the Local plan for the Broads policy SP15, 2, iv – this is a strategic policy and therefore it seems that Policy 4 part G is contrary to SP15 of the Local Plan for the Broads. Thirdly, the policy does not meet NPPF para 80 – community benefits is not listed as a reason for market dwellings outside of development boundaries/in isolated locations.

Para 95 – what is pedestrian amenity? River Waveney.

Para 97 – Many of the sites **are** shown?

Policy 5 – are applicants expected to fill out the checklist?

Policy 6 – BNG will be in place for large schemes and maybe for smaller schemes by the time this Plan is made, but I note that this policy seeks BNG for all proposals that increase developed floor space whereas the mandatory schemes has some exemptions. What is the intention? To have this policy in case BNG does not become mandatory? Or if it is in place, change schemes to which it applies? Or remove the policy later on when BNG confirmed as being in place? We don’t necessarily object to the policy or that it changes the types of schemes to which BNG applies, just asking what you plan to do.

Para 117 – what do you mean by ‘night lights’? Do you mean levels of darkness?

Para 122 – should this refer to the BA’s policy on community facilities?

Evidence base

Figure 4 and 5, 6, 7, 8, 9, 10, 11, 15, 17, 18, 28, 33 are from the 2011 Census – 2021 Census data is available.

Figure 28 – what are the initials in the title row?

Page 80 – Broads has a status equivalent to a National Park.

SEA and HRA

Figure 7 uses 2011 Census

Design Guide

We made these comment at the health check stage and they have not been amended. Please amend the Design Guide in line with these comments.

1.2 – ‘the current adopted Local Plan’ – think you mean GY Local Plan as there are two Local Plans relevant to the area.

The images need to have alt text.

3.4 – ends with ‘of the...’ but the sentence is not finished anywhere.